

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Case No.: 4:21-cr-697 SRC (DDN)
)
DANIEL BERT,)
)
Defendant.)

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW Defendant, Daniel Bert, by and through counsel, and moves this Court pursuant to 18 U.S.C. 3145 § (a)(2) to temporarily modify condition 7(p) of the conditions of release imposed. In support of this motion, Defendant states as follows:

1. Defendant is charged with a single count of Transportation of Child Pornography.
2. On December 20, 2021, this Court admitted Defendant to bail on a combination of conditions of release, determining that the conditions imposed would reasonably assure both his appearance at trial and the safety of the community.
3. Condition 7(p) is among the conditions imposed by this Court. Condition 7(p) consists of multiple components, among them, being various forms of restrictions on Defendant's movement.
4. Defendant was placed on Home Confinement and now requests this Court modify that placement to 3850 Park Avenue 1, St. Louis, MO 63110, United States beginning August 16, 2022.
5. Defendant has been residing with his mother in House Springs, Missouri. His mother is currently in the process of moving from House Springs, Missouri to

Sainte Genevieve, Missouri. Rather than move to Sainte Genevieve with his mother, Defendant wishes to move into his own apartment located at 3850 Park Avenue 1, St. Louis, MO 63110, United States.

6. Defendant, through counsel, has discussed this matter with Assistant United States Attorney, Kyle Bateman. Mr. Bateman has no objection to Defendant's request.
7. Defendant, through counsel, has discussed this matter with United States Pretrial Services Officer, Dan Fahl. Mr. Fahl has no objection to Defendant's request.

WHEREFORE, Defendant respectfully requests this Court temporarily modify the conditions of release imposed on December 20, 2021.

Respectfully submitted,

By: /s/ Marc Johnson

Marc Johnson, #580655 MO
Attorney for Defendant
120 S. Central Avenue, Suite 130
Clayton, Missouri 63105
(314) 862-4332

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2022, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Kyle T. Bateman, Assistant United States Attorney.